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CSAA General Insurance Company
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 **KRYSTAL ROSSE, individually,**

11 Plaintiff,

12 v.

13 **CSAA GENERAL INSURANCE COMPANY;**
14 **a foreign corporation, DOES I-**
X, and ROE CORPORATIONS I-X,
inclusive,

15 Defendant
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2:17-cv-01557-JCM-VCF

STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED by Plaintiff, KRYSTAL
18 ROSSE, and Defendant, CSAA GENERAL INSURANCE COMPANY to Extend
19 Discovery Deadlines by 70 days.

20 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

21 The following discovery has been completed by the parties:
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1. Defendant's Initial Disclosure, pursuant to FRCP 26(f);
2. Defendant's First Set of Requests for Admissions to Plaintiff;
3. Defendant's First Set of Interrogatories to Plaintiff;
4. Defendant's First Set of Request for Production of Documents to Plaintiff;
5. Defendant's Designation of Expert Witnesses and Documents;

B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:

1. Plaintiff to produce their initial disclosures;
2. Defendant & Plaintiff to disclosure their rebuttal experts;
3. Depositions of the Person Most Knowledgeable from Plaintiff's medical providers relevant to treatment rendered to Plaintiff since the date of this accident;
4. Depositions of Plaintiff and Defendant's experts;
5. Deposition of Plaintiff;

A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:

Plaintiff's counsel has made some changes within their office and has caused some delays in producing documentation and scheduling. Further, the holiday months has made scheduling

1 depositions difficult for both parties and the respective
2 individuals they are trying to schedule.

3 The parties believe that a modest addition of seventy days
4 will accommodate both parties sufficiently to conclude the
5 discovery that remains in this matter.

6 **D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	Old Deadline	New Deadline
8 Discovery Cut off:	02/23/2018	05/04/2018
9 Expert Disclosure:	12/22/2017	CLOSED
10 Rebuttal of Experts:	01/22/2018	04/04/2018
11 Interim Status Report:	03/26/2018	06/04/2018
12 Dispositive Motions:	03/26/2018	06/04/2018
13 Pre Trial Order:	04/25/2018	07/04/2018

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F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

DATED this 8th day of January, 2018.

RANALLI ZANIEL FOWLER & MORAN, ANTHONY PAGLIA INJURY LAWYERS
LLC

/s/ Benjamin Carman
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ORDER

IT IS SO ORDERED:

Dated: 1-9-2018

UNITED STATES MAGISTRATE JUDGE